IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

JOSEPHAT HENRY resident of Harvey, KAY WILLIAMS resident of Harvey, SYLVIA BROWNE resident of Clifton Hill, MAUDE DREW resident of Estate Barren Spot, MARTHA ACOSTA resident of Estate Profit. WILHELMINA GLASGOW as in individual and mother and next of friend of SAMANTHA VIERA, a minor, both residents of Estate Profit. MERCEDES ROSA resident of Estate Profit, JULIAN ST. BRICE, resident of Clifton Hill, GEORGE RODRIGUEZ as an individual and as father and next friend of AMANDO and GEORGE E. RODRIGUEZ, minors, all residents of Estate Profit, SONYA CIRILO resident of Estate Profit, RAQUEL TAVAREZ, resident of Estate Profit, NEFTALI CAMACHO, as an individual and as father and next friend of ANGEL JAVIER CAMACHO a minor, both residents of Estate Profit, EYAJIE MALAYKHAN resident of Estate Profit, CHEDDIE KELSHALL resident of Estate Profit and other persons too numerous to mention, A CLASS ACTION,

Plaintiff,

٧.

ST. CROIX ALUMINA, LLC, ALCOA INC., and GLENCORE, LTD., f/k/a CLARENDON, LTD.,

Defendant.

CIVIL NO. 1999/0036

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

AFFIRMATION OF LEE J. ROHN IN SUPPORT OF PLAINTIFFS' REPLY TO THE ALCOA DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO SUPPLEMENT THE RECORD ON APPEAL OF MAGISTRATE JUDGE'S SANCTIONS ORDERS



Henry, et al. v. St. Croix Alumina, LLC, et al., Civil No. 1999/0036 AFFIRMATION OF LEE J. ROHN IN SUPPORT OF PLAINTIFFS' MOTION TO SUPPLEMENT THE RECORD ON APPEAL OF MAGISTRATE JUDGE'S SANCTIONS ORDERS Page 2

| TERRITORY OF THE VIRGIN ISLANDS |) | |
|---------------------------------|---|-----|
| |) | SS. |
| DIVISION OF ST. CROIX |) | |

- I, Lee J. Rohn, being first duly sworn, declare under penalty of perjury that the foregoing is true and correct.
 - 1. I make this affirmation of my own personal knowledge and information.
 - 2. I am the Founding Partner of the Law Offices of Rohn & Cameron, LLC, counsel of record for Plaintiffs in the instant matter.
 - 3. Attached hereto as PL Supp Exh S-Y are true and correct copies of correspondence generated in the above-captioned case.
 - 4. Subsequent to the December 5, 2007 "meet and confer" with counsel for the Alcoa Defendants, counsel informed me that she did not agree with my representations as to the result of our meeting and that the Alcoa Defendants would produce no more documents.

ee J. Rohn

LAW OFFICES OF Rohn & Cameron, LLC 101 King Street Christiansted VI 00820-4933 340 778 8855